Postal Regulatory Commission
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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

STATUTORY REVIEW OF THE SYSTEM FOR)
REGULATING RATES AND CLASSES FOR) Docket No. RM2017-3
MARKET DOMINANT PRODUCTS)

COMMENTS OF THE AMERICAN MAIL ALLIANCE

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February 27, 2018

The undersigned associations and individual signers[1] have come together as the American Mail Alliance ("AMA") for the sole and limited purpose of showing unanimity in asking the Postal Regulatory Commission (Commission) to reconsider its proposed solution for the U.S. Postal Service's financial challenges.

AMA's members collectively represent the great majority of mail volume – and revenue – in the Market Dominant segment of the mail stream, and their suppliers. The undersigned AMA members – associations, corporations, non-profit organizations, and other postal stakeholders – are united in the belief that, contrary to restoring financial stability to the Postal Service, the Commission's proposal will drive a great deal more volume and revenue out of the system, imperiling businesses, jobs, and the Service itself. Business mailers, a very broad segment of which are in the combined membership of our associations, largely fund the provision of universal postal service in the United States and are heavily invested in the future of the Postal Service. Many of us will be submitting our own comments or alternative proposals. But we all strongly oppose the Commission proposal to solve the complex problems of the Postal Service with the single solution of rate increases much higher than inflation.

The Commission's proposal will not solve the Postal Service's financial "problems" and will, we believe, cause lasting damage to the Postal Service and to the $1.4 trillion mailing industry – and the 7.5 million jobs it supports – which depend on the Postal Service for communications, correspondence, fundraising, and commerce. Although we represent business interests and nonprofit organizations, through our frequent interactions with them, we can also speak to the interests of America's citizens and consumers who have come to rely on the Postal Service; the one "utility" and service that binds the nation together and is still "free" to every residential and business recipient. This valued service, which for many is their one regular contact with the federal government, could be jeopardized by the drastic increases in postal rates that will result from the Commission proposal.

[1] Additional parties who have requested to be identified as supporting these comments are listed in Attachment A.

I. THE POSTAL SERVICE'S POOR FINANCES ARE NOT 'DUE TO' DEFICIENCIES IN THE RATE-MAKING SYSTEM.

In its orders, the Commission largely agrees that the current rate-setting system is achieving the objectives and factors of the Postal Accountability and Enhancement Act (PAEA). The Commission's chief concern appears to be that Postal Service finances are poor and that the Postal Service has not been able to achieve medium- and long-term financial stability. We submit, however, that these shortcomings are not "due to" any deficiency in the rate-setting system. They are due primarily to the Congressional retiree health prefunding mandate that was set up for Congressional Budget Office (CBO) "scoring" purposes and, while the Postal Service was flush, to "pay for" the full liability for retiree health care from postage. While this "pay for" enabled passage of a bill that gave the Postal Service some new flexibilities and opportunities to manage its own business and prices, it saddled USPS with an unprecedentedly massive prefunding obligation that has been a drag on the system, and has dramatically weakened the Postal Service's balance sheet since PAEA was enacted.

Having begun the PAEA era with a financial handicap, the Service's situation was immediately worsened when expectations of continuing growth in postal volumes proved wrong; diversion of First-Class Mail to electronic alternatives accelerated with the introduction of the iPhone and the advent of social media. Then, the Postal Service and mailing industry were both damaged by the Great Recession. Moreover, rather than pursue a strategic default, the Postal Service used its limited borrowing power to make unsustainable prefunding payments until it exhausted its $15 billion borrowing authority.

Over 90 percent of Postal Service losses in the last decade are "due to" this misguided prefunding. Evidence submitted in Phase I of this rulemaking proceeding shows that the Postal Service is better funded for retiree benefits than any other federal, state, or private sector entity. In total, more than $340 billion are already set aside in the U.S. Treasury for that purpose. Further, data before this Commission show that USPS obligations are overestimated while its assets are undervalued. The other shortcomings the Commission finds in its rate review – not maintaining high quality service standards and not increasing price efficiency – could be ameliorated without burdening mailers with prices that are significantly higher than the rate of inflation for the next five years.

We submit that the Commission should focus on consequences that are "due to" the rate-setting process, rather than the consequences of actions of Congress. If the Commission were to appropriately narrow its focus in this way, it would agree that the current system should continue with the rate cap in place. There is no need for the Commission to take action now. Additional rate authority should not be given unless, or until, the Postal Service's actual business of delivering the mail requires Commission intervention. The Commission has the right to review the rate-setting process at any time in the future. Now is not the time to devastate the entire mailing industry with higher costs "due to" the financial pressures overwhelmingly created by the prefunding requirement.

II. THE COMMISSION PROPOSAL PUTS TOO MUCH WEIGHT ON A SINGLE OBJECTIVE.

As noted above, the Commission largely finds the PAEA system has provided a vastly improved ratemaking environment. Mailers agree. No one wants to see cost of service rate-making return. For most stakeholders in the industry, predictability, rate stability, and transparency have been achieved. The current system has met mailer needs and funded ongoing USPS operations.

But when it comes to the future of ratemaking, among all of the relevant Objectives and Factors, the Commission appears to unduly focus on Objective 5, the Postal Service's financial stability, at the expense of other objectives. Objective 5 not only has been treated as first among equals*,* it has virtually overshadowed the balance of the objectives set out as equals by Congress in PAEA. The notion that "someone" should pay whatever is needed to help the Postal Service achieve medium-term stability, and even build up retained earnings as some sort of entitlement, puts Postal Service finances before all other Factors and Objectives of the rulemaking.

This was not the intent of Congress in PAEA. Had it been, Congress would have written it that way. “Adequate revenues” would have stood first and foremost or would have been singled out in the law as some “prime directive.” But it was not written that way. Notably, the first stated objective is to maximize incentives to reduce costs and increase efficiency. Indeed, in its Order and Determination, the Commission stated that the CPI cap is an indispensable tool to provide incentives for Postal Service management to control costs. Adding yearly surcharges totaling 3 to 5 percentage points above CPI to achieve Objective 5 is inconsistent with the other Objectives and requirements of the law. It defies logical explanation, to those who must foot the bill of this great network, that all other Objectives are subordinated to improve mid- to long-term financial performance.

There is no assurance in this proposal that the Postal Service will start meeting its service standards. For every shortcoming identified in the 10-year lookback, the only parties required to suffer any consequences, through vastly higher rates, are the mailers. The proposed rulemaking puts one Objective above them all. This is not what the law requires. Although the Postal Service has repeatedly failed to follow suggestions made by the Commission in the past, and the Commission is attempting to compel the Postal Service to set prices that are more efficient or related to costs in the future, the proposal from the Commission does not compel or incentivize the Postal Service to reduce costs. It only, to be blunt, throws money at the problem. This is not a formula for medium-, and certainly long-term, stabilization.

There is no reason within the current scheme of postal ratemaking that the Postal Service cannot be asked, and expected, to achieve improvements in service and more efficient pricing. The Commission has had that power in its annual compliance review and rate review proceedings all along. This is not the time to confine the solution to mailers through punishing and unaffordable price increases for at least 5 more years.

III. TWO WRONGS DON’T MAKE A RIGHT.

The Commission ruling in the 10-year rate review, and its resulting rulemaking, largely stem from the Commission’s acceptance of the Postal Service’s $62 billion in retirement liabilities “as a given” that the Commission must accept and that it alone must repair. The red ink and accumulated debt on the Postal Service's balance sheet have been baked into the Postal Service's reported finances by ill-conceived prefunding mandates in the PAEA. Though many in the industry have tried mightily to enact legislative fixes to what is clearly a legislative problem, those fixes have proven elusive. In determining that it must offset these obligations with rate increases, the Commission compounds the problem and the error of the fundamental assumption in PAEA that USPS could indefinitely fund such crushing payments.

We respectfully disagree with that determination. This is a Congressional problem that needs a Congressional solution. The Postal Service has defaulted on this debt for several years without consequence. The Treasury is not about to foreclose on the Postal Service. Although the red ink looks bad, it does not have any practical consequences for the Postal Service in terms of its ability to fulfill its mission. In spite of a historically low period of inflation over the past 10 years, and the Great Recession, the Postal Service is still covering its operating expenses.

We agree that this is a problem and it should be fixed. But it is the job of Congress, not the Commission. Moreover, the proposed fix is flawed. In its zeal to rescue the Postal Service from red ink, the Commission has applied a simple, single solution to a complex problem. It requires a more nuanced approach.

By proposing only one solution – much higher postage rates – the Commission has succumbed to the fallacy that one response can fix a complex problem with multiple causes. The Commission recognized those multiple causes for the Postal Service's financial difficulties that were set out in stark relief in our initial comments. The Commission evidently was not swayed that these multiple causes require multiple solutions, and not just a major, deeply counterproductive increase in rates. The Commission in this crisis has failed to invoke the full scope of its authority to shape Postal Service behavior on costs through price incentives and *dis*incentives. With respect, we believe the Commission short-changes the Postal Service and the customers for whom it is a check and balance if higher rates are its only focus to address deficiencies in postal finances and service.

The Commission's proposal for 5 years of rate increases that are utterly noncompetitive when the Postal Service's inability to compete on current price constructs is manifest – as surprise declines in mail in the past 2 years demonstrate – has no prospect of making things right.

IV. THE COMMISSION PROPOSAL WILL DO MORE HARM THAN GOOD.

AMA's members unanimously believe that the Commission rulemaking proposal will do lasting harm to the Postal Service. It will put many mail and supply chain stakeholders out of business, force them out of the mail, or push them to find – or create – alternative, cheaper, and more stable distribution methods. We understand that some on the Commission or Commission staff may believe that Postal Service volumes are inelastic, and that the Postal Service can pass on price increases and the industry will just "take it." Some point to the industry's survival during exigency as "proof" that mail volumes did not suffer lasting declines.

All of us disagree with that assessment of the impact of the exigency increase and conclusion. But importantly, we must stress that exigency was different. It was clearly a short-term response to the Great Recession. Many in the industry fought to oppose and ameliorate the increase, and to roll it back, throughout protracted Commission proceedings. It was NOT a forever increase in the costs of doing business with the Postal Service. Users of the mail could anticipate an eventual return to the CPI price cap. Under the Commission's proposed solution there is no reason for similar optimism on the part of companies deciding whether or not to continue in the mail.

The proposed rule comes at a time when the Postal Service is fighting to retain business. Prior years of operations in or near the black under the stability of the rate cap raised industry's confidence level that the Postal Service, working within the CPI cap, could remain a cost competitive service provider, even with some diversion of mail. But the Postal Service is challenged by decreasing demand in its Market Dominant products – precisely the ones facing these counterproductive increases. What rational business dramatically raises price in a competitive environment of reduced demand? Irrespective of historical elasticity debates, and claims of mailers "crying wolf," we believe this proposal will be the tipping point leading to even more – this time massive –

permanent reductions in mail volumes.

The Commission proposal essentially announces to the world that the Postal Service will be charging much higher prices for at least the next 5 years and, for some products, will be charging prices that are double or triple the rate of inflation. It is like hanging a neon sign on every mail truck that reads: “Same service – new higher prices!”

For those of us who survived the exigency increase, we can assure you that our customers did not simply “pay more.” Many of us struggled to stay in the mail by demanding efficiencies and price commitments from our other supply chain providers that have helped to offset increases in postage rates. We value the Postal Service and want to keep it healthy and able to continue to reach every home and business in the country. We genuinely fear that this proposal could prove a cure that is worse than the disease, and quite possibly fatal to the system’s self-sustaining business model.

V. CONCERN FOR UNINTENDED CONSEQUENCES

We feel compelled to also respond directly to the extra 2 percent annually proposed for “underwater” products. Not all of the undersigned stakeholders agree, or have one voice, when it comes to the challenge of underwater products. We all agree that every Postal Service product, including those under water, should “pay its fair share.” To varying degrees, we have significant reservations about whether the Postal Service has made wise operating choices in handling certain types of mail, including “underwater products.” But, the plain truth is that for those products, an extra 2 percent per year on top of the huge base rate change proposed for all Market Dominant products, compounded, will be devastating.

And that devastation will directly and severely impact all mail. Among those mailers producing underwater products are charitable organizations, local newspapers, catalogs, and magazines. Along with checks, credit cards, statements of accounts, various insurance documents, and other vital communications, the fundraising, news, features and opinions, and advertising products give consumers strong reason to go to the mailbox – forming the “Mail Moment” when consumers interact with the mail and often generate more business or contributions, not to mention more mail volume. In a declining business, such as the Postal Service's market dominant mail sector, the last thing that should be done is to dampen an incentive for consumer interaction with the mail. Nonetheless, the rates proposed by the Commission overall, punctuated by the "kicker" to underwater products, not just dampen, but outright wash away, that incentive.

The Commission proposal does little or nothing to challenge the Postal Service to take lasting steps to streamline costs. Instead, by simply mandating much higher prices, it removes the pivotal incentive to cut costs. The industry believes that it is hardly a coincidence that the Postal Service achieved larger cost savings when constrained by a rate cap. In addition, these higher prices will deter the Postal Service and mailers from exploring products or prices that could help the Postal Service gain market volumes and improve its competitive position.

For the many businesses and associations below that work to bring customers to the mail, the Commission has made our job that much harder. For those that would like to "break up" the postal monopoly, five years of above-market price increases may be a rallying cry to end the mail box monopoly and open the mail box to competition. That would create turmoil and more uncertainty in a wobbling and declining industry by sparking a major divide between those who would wish to maintain and those who would wish to abolish that monopoly. Certainly, this proposal would stimulate demand, and create economies of scale, for alternative delivery services. With so many on Capitol Hill and at Beltway think-tanks willing to consider various privatization scenarios, this proposal provides fuel for those seeking to alter the status quo, with unforeseen consequences for universal service, prices, and the overall future of the system.

VI. CONCLUSION

Thanks to an irresponsibly aggressive prefunding schedule, the Postal Service's balance sheet is colored in red. The Postal Service faces intensifying pressure from substitutes for its core market dominant products and declining demand as shown by disappointing letter and flat volumes. On the other hand, it continues to generate around $70 billion in annual revenues and has an unmatched delivery network.

We are at a critical juncture. The outcome of this proceeding may help turn the Postal Service around and preserve a viable postal system for decades. Alternatively, by trying to solve a complex tangle of issues with a lone tool, the Commission may be inadvertently hastening the demise of the Postal Service. The risks are too great. We recognize that the Commission's powers are limited, but those limits should not lead the Commission to overplay its hand.

The Postal Service is a unique institution, which makes comparisons with other businesses tricky. But this is not the first time a venerable enterprise with a long history has confronted a crisis. The history of U.S. commerce is brightened by companies that have achieved remarkable turnarounds. Corporations such as Apple, Chrysler, Disney, HP, IBM, and others have faced near disaster. The key to a successful turnaround or reinvention often depends on a particular set of circumstances, but there is one thing you will not find. There is no precedent for an organization in any industry that succeeded through exorbitant price increases in the face of weak demand.

AMA members want the Postal Service to succeed. In many ways we have supported the Postal Service's efforts to adapt to its changing environment. However, we all gravely feel that the Commission's proposal is a poor choice and, if it takes effect, the Postal Service's future may look more like Woolworths or Eastern Airlines or Blockbuster or Radio Shack.

Respectfully submitted,

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Attachment A

The parties below have requested that they be identified as supporting the Comments of the American Mail Alliance:

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Arandell Corp.
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Eastern Marketing Services
Engel Printing & Publishing Co. Inc
Everything Marketing, LLC
Exchange Media Group
Genesee Valley Publications
Harte Hanks
Hartford Courant Media Group
Hersam Acorn Network/ Newspapers
Herald Community Newspapers
Mailbox Merchants
Main Street, Inc.
MSPark
National Mail It, LLC
PrimeTime Guide
Publishers Clearing House
Richner Communications Inc.
Richner Printing & Mailing
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Western News & Info, Inc.
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